



March 30, 2021

The Honorable David Hickernell, Chair
The Honorable Jake Wheatley, Jr., Democratic Chair
Committee on Professional Licensure
Pennsylvania House of Representatives
501 N 3rd Street
Harrisburg, PA 17120

RE: House Bill 19

Dear Chairmen Hickernell and Wheatley:

On behalf of the American Speech-Language-Hearing Association, I write to comment on H. B. 19, which would allow the licensure of individuals providing applied behavior analysis (ABA) services, including those associated with the treatment of autism spectrum disorder. As written, this legislation impedes the ability of licensed audiologists and speech-language pathologists to assess and treat communication disorders for individuals with autism spectrum disorder.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 218,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 9,000 ASHA members reside in Pennsylvania.¹

Autism spectrum disorder (ASD) is a complex neurobiological disorder characterized by social impairment, communication difficulties, and repetitive and stereotyped behaviors for which speech-language pathologists (SLPs) play a critical role in assessing and treating. Social interaction and communication, speech production, understanding, and using spoken and written language are examples of neurodevelopmental functions. They are not solely "behaviors."

ASHA maintains that SLPs should be included in any comprehensive assessment and treatment for individuals with ASD since SLPs are able to prioritize intervention objectives and coordinate planning for communicative success. While ABA therapists may work on an individual's behaviors, SLPs have the educational background that enables them to focus on understanding and using language, social communication, literacy, speech production, and augmentative and alternative communication. In ASHA's 2020 Schools Survey, 92% of school-based SLPs indicated they provide services to children with ASD.²

Individuals with communication disorders, and their families, must be provided with a full complement of services designed to meet their individual needs. Allowing individuals without the appropriate education and training to make assessment decisions about an individual's communication needs may result in an inaccurate assessment and inappropriate recommendations for services to the family. Utilizing a team of qualified professionals including physicians, mental health professionals, SLPs, ABA therapists, and others will ensure that an individual diagnosed with ASD receives a comprehensive assessment and the full complement of services necessary to meet their unique needs.

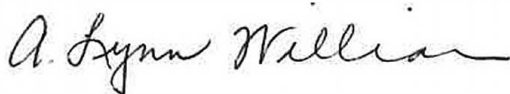
To address these concerns, ASHA offers the following amendments to H.B. 19:

- Amend page 8, by inserting the following after line 10:
 - (14) An individual licensed to practice audiology or speech-language pathology. Nothing in this section shall be construed to prohibit, limit, include, or affect the practice of audiology or speech-language pathology.
- Amend page 19, line 29 and page 20, line 1 to read:

(3) The term does not include the diagnosis of disorders, psychological testing, psychotherapy, cognitive therapy, psychoanalysis, and counseling. This term does not include the diagnosis or treatment of communication disorders as defined as the “practice of audiology” and the “practice of speech-language pathology” under 49 Pa. Code Chapter 45.11.

Thank you for your consideration of ASHA's recommended amendments to H.B. 19. If you or your staff have any questions, please contact Susan Adams, ASHA's director of state legislative and regulatory affairs, at sadams@asha.org.

Sincerely,



A. Lynn Williams, PhD, CCC-SLP
2021 ASHA President

¹ American Speech-Language-Hearing Association. (2020). *Pennsylvania* [Quick Facts]. <https://www.asha.org/siteassets/uploadedfiles/Pennsylvania-State-Flyer.pdf>.

² American Speech-Language-Hearing Association. (2020). *Survey Summary, Speech-Language Pathologists*. <https://www.asha.org/siteassets/surveys/2020-schools-slp-summary.pdf>.